



EXHIBIT D

[REDACTED]

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION

4 -----x
5 BARCO, INC., AND BARCO NV, :
6 Plaintiffs, : Case No.:
7 v. : 2:23-cv-00521-JRG-RSP
8 YEALINK (USA) NETWORK TECHNOLOGY :
9 CO., LTD., AND YEALINK NETWORK :
10 TECHNOLOGY CO., LTD., :
11 Defendants. :
12 -----x

13 *** [REDACTED] ***

14 Videotaped deposition of DUNXIONG CAI
15 VOLUME 1
16 Sunday, April 13, 2025
17 AT:
18 10:00 a.m.

19 Taken at:
20 K&L Gates LLP
21 44th Floor
22 Edinburgh Tower, The Landmark
23 15 Queen's Road Central, Hong Kong
24 1+852 2230 3500

25 Court Reporter:
KATHERINE SCHILLING, RPR
CA CSR No. 14163

[REDACTED]

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1 A P P E A R A N C E S

2 Appearng for the Plaintiffs, BARCO, INC., and
3 BARCO NV:

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5 K&L GATES LLP
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8 San Francisco, California 94111
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11 Appearng for the Defendants, YEALINK (USA)
12 NETWORK TECHNOLOGY CO., LTD., AND YEALINK
13 NETWORK TECHNOLOGY CO., LTD.:

14 STEPHEN YANG, PARTNER
15 DENTONS US LLP
16 1221 Avenue of the Americas
17 New York, New York 10020
18 (212) 398-4890
19 stephen.yang@dentons.com

20 ALSO PRESENT:
21
22
23
24
25

26 Matthieu Leulier, videographer
27 Helena Chung, interpreter
28 Amanda Lin, check interpreter
29 Feifei Yu, Yealink corporate representative

[REDACTED]

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1 THE WITNESS: So this is an alternative, so
2 that the clients can choose something with the
3 wires. They can also choose something wireless.

4 At that time, we did quite a number of
5 wireless sharing functions. And they will include
6 casting methods that would support the Miracast,
7 AirPlay standard.

8 CHECK INTERPRETER: Correction:

9 "At that time, we worked on several
10 wireless sharing functions, including the standard
11 methods that -- standard casting methods that
12 support Miracast and AirPlay."

13 BY MR. HALVERSON:

14 Q. Where did Yealink get the idea for the
15 WPP20 product?

16 A. Where it got the idea?

17 MR. YANG: Is the witness thinking? Or is he
18 answering the question?

19 MR. HALVERSON: I don't know. You can ask the
20 witness. That's what he said.

21 MR. YANG: Yeah. Can you check with him?

22 MR. HALVERSON: No --

23 MR. YANG: Hold on now.

24 Can you check with him, please?

25 MR. HALVERSON: All right. Let me ask the

[REDACTED]

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1 MR. YANG: And I will just note for the record
2 that the previous question is outside the scope of
3 Mr. Cai's corporate testimony today. Or, rather,
4 the question, the few questions previous to the one
5 that was just asked.

6 BY MR. HALVERSON:

7 Q. | [REDACTED]

| [REDACTED]

| [REDACTED] | [REDACTED]

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24 Q. What wired casting accessories does
25 Yealink sell?

[REDACTED]

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1 A. Are you talking about the models?

2 CHECK INTERPRETER: "Model numbers."

3 BY MR. HALVERSON:

4 Q. Model numbers or product names, however
5 you would refer to them.

6 A. Our wired casting product model numbers
7 would include VCH50 and VCH51.

8 Q. What features does Yealink advertise as
9 benefits of the WPP30 as compared to the VCH50?

10 CHECK INTERPRETER: Check interpreter's
11 rendition:

12 "(Chinese spoken)."

13 THE WITNESS: We would not say that one of our
14 accessories would be superior to another one of our
15 accessories. We would only talk about what
16 scenarios would be applicable.

17 CHECK INTERPRETER: "We would not say that one
18 accessory is better than another accessory.
19 We would only describe what scenarios they can be
20 applied to."

21 BY MR. HALVERSON:

22 Q. Does Yealink's WPP30 provide any
23 advantages over the VCH50?

24 MR. YANG: Objection to form.

25 THE WITNESS: I have already answered that

[REDACTED]

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1 our videoconferencing system."

2 BY MR. HALVERSON:

3 Q. Can Yealink's host machine of Yealink's
4 videoconference system receive audio or video
5 information from a non-Yealink transmitter?

6 MR. YANG: Objection to scope.

7 CHECK INTERPRETER: Check interpreter's
8 rendition:

9 "(Chinese spoken)."

10 THE WITNESS: Our Teams or Zoom conferencing
11 system can receive casting data sent over by Teams
12 or Zoom apps.

13 BY MR. HALVERSON:

14 Q. Wirelessly, wired, or both?

15 A. Both.

16 Q. And so if there was a Teams or Zoom
17 conferencing system in this room, could I send data
18 from my laptop to that system?

19 A. Yes.

20 Q. Without any sort of physical plug-in
21 device?

22 A. Yes.

23 Q. How?

24 A. Via Teams' or Zoom's software, or what we
25 call the app, there are such functionalities called

[REDACTED]

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1 Team casting or Zoom sharing. In such cases,
2 there's no need to plug in any dongles, and you can
3 do the sharing.

4 Q. When you use the word "dongle," what do
5 you mean?

6 A. I'm referring to WPP.

7 Q. Do you consider Barco's ClickShare to be
8 a dongle?

9 A. Yes.

10 Q. Who else makes dongles other than Barco
11 and Yealink?

12 MR. YANG: Objection to scope.

13 You can answer.

14 THE WITNESS: According to my knowledge, there
15 is this company called Mixhub [sic].

16 CHECK INTERPRETER: "Maxhub."

17 THE WITNESS: Maxhub.

18 BY MR. HALVERSON:

19 Q. Does Yealink have any patents on its
20 WPP20 or WPP30 dongles?

21 MR. YANG: Objection to scope.

22 CHECK INTERPRETER: Clarification:

23 "(Chinese spoken)."

24 THE WITNESS: I don't really know.

25 BY MR. HALVERSON:

[REDACTED]

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1 MR. HALVERSON: Objection. Form.

2 THE WITNESS: It's also doable, achievable.

3 MR. YANG: I do not have any questions. Thank
4 you for your time.

5 MR. HALVERSON: Very briefly.

6 THE WITNESS: Thank you, everyone --

7 MR. YANG: Hold on.

8 EXAMINATION BY COUNSEL FOR PLAINTIFFS

9 (Main interpreter is now Helena Chung)

10 BY MR. HALVERSON:

11 Q. Miracast and AirPlay wirelessly cast
12 using the transceiver for the device to which they
13 are plugged into; correct?

14 CHECK INTERPRETER: Clarification:

15 "(Chinese spoken)."

16 MR. YANG: Objection. Form.

17 THE WITNESS: There's no need to plug into any
18 device.

19 BY MR. HALVERSON:

20 Q. There is no separate hardware for
21 Miracast and AirPlay; correct?

22 A. Correct. They can be realized on the
23 computer, without the need to plug into any
24 additional equipment or device.

25 Q. And then you also said that it is

[REDACTED]

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1 possible to achieve wireless casting through Teams
2 or Zoom app, in response to a question from
3 Mr. Yang.

4 Do you recall that?

5 A. Yes. You can realize wireless casting
6 via Teams or Zoom app.

7 Q. And that also would use the transceiver
8 of the computer that is running that application;
9 correct?

10 A. You only need to do it through the
11 computer. There is no need for any additional
12 equipment.

13 Q. Did you talk to Mr. Yang about your
14 testimony at all today?

15 MR. YANG: Let me just clarify. Are you
16 talking about before or after the deposition
17 started? So I can understand whether I need to make
18 an objection.

19 MR. HALVERSON: After, but I can ask it more
20 clearly, if you would like me to.

21 MR. YANG: Go ahead. Yeah, let's do that.

22 BY MR. HALVERSON:

23 Q. After we started today's deposition, did
24 you talk to Mr. Yang about your testimony at all?

25 CHECK INTERPRETER: Clarification:

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Veritext Legal Solutions
1100 Superior Ave
Suite 1820
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April 16, 2025

To: STEPHEN YANG

Case Name: Barco, Inc. And Barco NV v. Yealink (USA) Network Technology Co., Ltd. Et Al.

Veritext Reference Number: 7292810

Witness: Dunxióng Cai Deposition Date: 4/13/2025

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown

above, or email to production-midwest@veritext.com.

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,

Production Department

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